

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

Loandepot.com, LLC,

Plaintiff,

v.

Bob Bowman, et al.,

Defendants.

Case No. Case No.: 1:22-cv-01874

Judge: Honorable Edmond E. Chang

JOINT MOTION TO EXTEND TIME ON CERTAIN DEADLINES

Plaintiff loanDepot.com, LLC (“loanDepot”) and Defendants CrossCountry Mortgage, LLC (“CrossCountry”), Steve Schneider, Cindy Smolin, Samantha Siegel, Fernanda Baske, Bob Bowman, and John Noyes (collectively, “Individual Defendants,” and collectively with CrossCountry, “Defendants”) respectfully jointly move this Court for an order amending certain deadlines in this action, for the reasons stated herein:

1. The parties submit this joint motion to extend certain case-related deadlines related to the recent filing of loanDepot’s First Amended Complaint ECF No. 100) (the Amended Complaint). In light of numerous additional allegations contained in the Amended Complaint, Defendants seek sufficient time to respond. Based on Defendants’ responses to the Amended Complaint, loanDepot needs adequate time to review such responses in advance of expedited discovery depositions, and as such, the parties seek a brief extension of time for completing expedited discovery and relatedly for extension of the TRO.

2. Additionally, counsel for loanDepot (Colton Long) is expecting the birth of his child at the beginning of November, and the parties additionally seek the brief extensions detailed herein in light of this event.

3. Accordingly, the parties respectfully submit, and ask the Court to order, the following amended deadlines.

4. **Deadline for Defendants to Respond to Amended Complaint.** loanDepot filed its Amended Complaint on September 26, 2022. The Amended Complaint contains numerous new allegations against Defendants, in addition to adding a new Individual Defendant, John Noyes (Noyes). Defendants¹ seek additional time to respond to the Amended Complaint to sufficiently address the newly added allegations. The parties move the Court to allow Defendants up to and including October 28, 2022 to file responses to the Amended Complaint.

5. **Extension of TRO Deadline and Expedited Discovery.** The Court has previously encouraged the parties to confer on the deadline for the expiration of the TRO and make proposals to the Court regarding the same (ECF 23, 46, 51, 68, 75, 97). Consistent with this prior guidance, and in order to avoid motion practice on this issue (and conserve judicial economy), the Parties have agreed to extend the TRO ordered by the Court (ECF No. 21) from November 30, 2022 to December 15, 2022. The parties also move the Court to extend the deadline for the parties to complete expedited discovery to December 15, 2022. The parties request these brief extensions to allow sufficient time for loanDepot to review Defendants' responses to the Amended Complaint in advance of expedited discovery depositions, in addition to allowing a brief extension due to the birth of loanDepot's counsel's child at the beginning of November.

6. This motion is submitted to this Court in good faith to ensure efficient and speedy administration of this matter, to permit adequate time for Defendants to respond to newly added

¹ Newly added Defendant Noyes has returned a waiver of service to loanDepot's counsel, and as such, his deadline to file a response to the Amended Complaint is November 29, 2022. Noyes does not join all other Defendants in this specific request and will file his response to loanDepot's Amended Complaint on or before November 29, 2022.

allegations in the Amended Complaint, to avoid further motion practice regarding expedited discovery, and not for purposes of delay or any other illegitimate purpose.

For the reasons set forth above, loanDepot, CrossCountry, and the Individual Defendants respectfully ask for an order consistent with the deadlines and terms set forth above.

Dated: October 10, 2022

LITTLER MENDELSON, P.C.

/s/ Colton D. Long

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was filed via the Court's CM/ECF filing system on October 10, 2022, which served copies on counsel of record for all parties to this action.

/s/ Jeffrey L. Widman

One of the Individual Defendants'
Attorneys